

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

IN RE: TRI-STATE CREMATORY     )  
LITIGATION                             )     MDL Docket No.: 1467

**MOTION FOR PERMISSION TO CONDUCT DISCOVERY AND  
DEPOSITIONS ON THE REASONABLE DISTRIBUTION OF  
ATTORNEYS FEES**

Comes now, Robert M. Darroch and moves the Court for Permission to Conduct Discovery and Depositions related to the reasonable distribution of attorneys fees in this case.

Specifically, the following discovery should occur:

1. Itemized time records should be produced by:
  - a. Lief Cabraser
  - b. McCamy Phillips Tuggle & Fordham LLP
  - c. Robert Darroch and his law firms.
2. Any correspondence, email or other written or electronic documentation related to or impacting the fee distribution should be produced by all of the attorneys.
3. If requested, depositions should be given by:
  - a. Elizabeth Cabraser
  - b. Kathryn Barnett
  - c. Robert Smalley
  - d. Robert Darroch

All such discovery should be kept confidential and submitted to the Court in camera to avoid any disclosure of attorney client privilege or work product.

Wherefore, Robert M. Darroch prays that the Court enter an order granting Permission to Conduct Discovery and Depositions related to the reasonable distribution of attorneys fees in this case.

This 25<sup>th</sup> day of October, 2007.

Respectfully submitted,

GOODMAN MCGUFFEY LINDSEY &  
JOHNSON, LLP

BY: 

**ROBERT M. DARROCH**

GA State Bar No.: 205490

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#### CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2007 I presented the foregoing document to the Clerk of Court for filing and uploading to the CM/ECF System, which will automatically send email notification of such filing to all counsel of record registered with the Court's electronic filing system.

s /Robert M. Darroch

**Robert M. Darroch**